

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	16-24242
Lamont McCune	)		
Debtor	)	Chapter:	Chapter 13
	)		
	)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

To: Lamont McCune, 9734 S. Yates Blvd, Chicago, IL, 60617  
Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604  
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604  
SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **August 8, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **Timothy A. Barnes** at 219 S. Dearborn, Courtroom 744, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 7/16/2019.

By: /s/Dale Riley  
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

AT&T  
Attn: Bankruptcy Dept.  
PO Box 8212  
Aurora IL 60572-8212

Commonwealth Edison Company  
C/O Credit Protection ASSO  
13355 Noel Rd Ste 2100  
Dallas TX 75240

Escallate LLC  
Attn: Bankruptcy Dept.  
5200 Stoneham Rd  
North Canton OH 44720

Friendly Finance Corporation  
Bankruptcy Dept  
6340 Security Blvd Ste 200  
Baltimore MD 21207

Will County Circuit Court  
Bankruptcy Dept.  
14 W. Jefferson St  
Joliet IL 60432

Markoff Law LLC  
Bankruptcy Dept.  
29 N. Wacker Drive Suite 550  
Chicago IL 60606

Ocwen LOAN Servicing I  
Attn: Bankruptcy Dept.  
4828 Loop Central Dr  
Houston TX 77081

Peoples Gas  
Bankruptcy Department  
200 E. Randolph Dr.  
Chicago IL 60601

Santander Consumer USA  
Attn: Bankruptcy Dept.  
Po Box 961245  
Ft Worth TX 76161

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<b>In Re:</b>  <b>Lamont McCune</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 16-24242</b>  <b>Chapter: Chapter 13</b>  <b>Judge: Timothy A. Barnes</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Mr. Lamont McCune (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 07/28/2016.
3. The Debtor’s plan was confirmed by the Court on 09/15/2016.
4. The Debtor has fallen behind on his Chapter 13 plan payments because he is off work for medical reasons.
5. The Debtor anticipates returning to work in September 2019, at which point he will be able to resume plan payments and an increased monthly plan payment of \$635, however he is unable to cure the default.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan suspend the July and August 2019 plan payments, to increase the monthly plan payment to \$635, and to defer the arrears to the end of the plan term.

Court enter an order:

1. Suspending the July and August 2019 plan payments,
2. Increasing the monthly Chapter 13 plan payment to \$635,
3. Deferring arrears to the end of the plan term,
4. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

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Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960